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Attorneys for Defendant Tenza Trading Ltd.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

**CALISTA ENTERPRISES LTD**, a  
Republic of Seychelles Company,

Plaintiff,

vs.

**TENZA TRADING LTD.**, a Cyprus  
Company,

Defendant.

No. 3:13-cv-01045-SI

JOINT STIPULATED MOTION TO EXTEND  
EXPERT DEADLINES

PURSUANT TO LR 16-3

Tenza Trading Ltd. (hereafter “Tenza”) and Calista Enterprises, Ltd. (hereafter “Calista”) submit the following stipulated motion.

**Local Rule 7.1 Certification**

The undersigned counsel certify that the motion at issue is stipulated by counsel.

**Motion**

The parties request a brief extension of two weeks for each of the current expert discovery deadlines to accommodate Calista’s need for additional time to provide certain information related to Tenza’s claim for damages. The current deadlines and proposed extensions are as follows:

<b>PRESENT DEADLINE</b>	<b>PROPOSED DEADLINE</b>
Opening Expert Reports Due – 3/14/2014	March 28, 2014
Rebuttal Expert Reports Due – 3/28/2014	April 11, 2014
Expert Depositions Completion Deadline – 4/18/2014	May 2, 2014

Calista anticipates supplementing its document production related to damages no later than March 21, 2014. Tenza’s damages expert will need an additional week with the supplemented discovery to finalize an initial report. The deposition deadline must also be moved to accommodate the new report schedule.

This motion is made in good faith and not for purposes of delay. The requested extension

will not require any modifications to any other case management dates that have been set by the Court.

Dated this 28<sup>th</sup> day of February, 2014.

Respectfully submitted,

s/ Devon Zastrow Newman

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